

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

JEREMY HUFFMAN, SR.,)
)
)
Plaintiff,)
)
)
v.) Cause No. 3:19-cv-169
)
)
ST. JOSEPH COUNTY, et al)
)
)
Defendants.)

FIRST REQUEST FOR PRODUCTION PROPOUNDED TO PLAINTIFF

Defendants, Head Nurse Lynn, Nurse Jason, Dr. Tieman and Dr. Hall (hereinafter collectively “Defendants”), by counsel, and pursuant to Rule 34, requests that Plaintiff produce all documents, including all things which are in the possession, custody and control of the Plaintiff, his attorney or other representative, within thirty (30) days of service hereof. Said production is requested at the offices of the Defendants’ counsel, Georgianne M. Walker and Amanda M. Jordan, of May Oberfell Lorber, 4100 Edison Lakes Parkway, Suite 100, Mishawaka, Indiana 46545.

1. Copies of any and all written grievances and/or complaints (formal or informal) you filed against Head Nurse Lynn for her alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

2. Copies of any and all written grievances and/or complaints (formal or informal) you filed against Nurse Jason for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

3. Copies of any and all written grievances and/or complaints (formal or informal) you filed against Dr. Tieman for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

4. Copies of any and all written grievances and/or complaints (formal or informal) you filed against Dr. Hall for his alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

5. Copies of any and all documentation relating to any other administrative remedies you pursued regarding Nurse Lynn's alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

6. Copies of any and all documentation relating to any other administrative remedies you pursued regarding Nurse Jason's alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

7. Copies of any and all documentation relating to any other administrative remedies you pursued regarding Dr. Tieman's alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

8. Copies of any and all documentation relating to any other administrative remedies you pursued regarding Dr. Hall's alleged failure to provide adequate medical care for the mass on your left elbow from October 2016 through November 2016.

RESPONSE:

9. Copies of any and all responses you received in response to any and all grievance, written complaints, and/or other administrative remedies you pursued, as identified above.

RESPONSE:

10. Copies of any and all written grievances and/or complaints (formal or informal) you filed against Head Nurse Lynn for her alleged refusal to provide you with an Ace wrap on July 9, 2017.

RESPONSE:

11. Copies of any and all written grievances and/or complaints (formal or informal) you filed against Nurse Jason for his alleged refusal to provide you with an Ace wrap on July 9, 2017.

RESPONSE:

12. Copies of any and all documentation relating to any other administrative remedies you pursued regarding Nurse Lynn's alleged refusal to provide you with an Ace wrap on July 9, 2017.

RESPONSE:

13. Copies of any and all documentation relating to any other administrative remedies you pursued regarding Nurse Jason's alleged refusal to provide you with an Ace wrap on July 9, 2017.

RESPONSE:

14. Copies of any and all responses you received in response to any and all grievance, written complaints, and/or other administrative remedies you pursued, as identified above.

RESPONSE:

15. Copies of any and all written grievances and/or complaints (formal or informal) you filed against Head Nurse Lynn for her alleged refusal to provide you with a second dressing change on July 20, 2017.

RESPONSE:

16. Copies of any and all written grievances and/or complaints (formal or informal) you filed against Nurse Jason for his alleged refusal to provide you with a second dressing change on July 20, 2017.

RESPONSE:

17. Copies of any and all documentation relating to any other administrative remedies you pursued regarding Nurse Lynn's alleged refusal to provide you with a second dressing change on July 20, 2017.

RESPONSE:

18. Copies of any and all documentation relating to any other administrative remedies you pursued regarding Nurse Jason's alleged refusal to provide you with a second dressing change on July 20, 2017.

RESPONSE:

19. Copies of any and all responses you received in response to any and all grievance, written complaints, and/or other administrative remedies you pursued, as identified above.

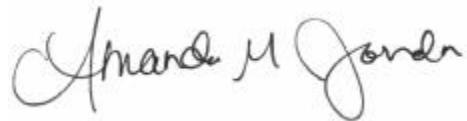
RESPONSE:

20. A copy of the Inmate Handbook you received from the St. Joseph County Jail.

RESPONSE:

21. Copies of any and all documentation related to St. Joseph County Jail's grievance procedure.

RESPONSE:



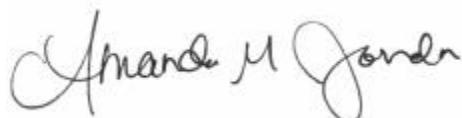
Georgianne M. Walker (23182-71)
Amanda M. Jordan (32129-71)
Attorneys for Defendants

MAY • OBERFELL • LORBER
4100 Edison Lakes Parkway, Suite 100
Mishawaka, IN 46545
Telephone: (574) 243-4100
Facsimile: (574) 232-9789

CERTIFICATE OF SERVICE

I certify that service of the above document was made on May 7, 2021 by U.S. certified mail, return receipt requested, postage affixed upon the following:

Jeremy Huffman, Sr.
16508-027
Beckley FCI
Federal Correction Institution
Inmate Mail/Parcels
P O Box 350
Beaver, WV 25813
Certified Mail #
Return Receipt Requested



Amanda Jordan (32129-71)